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ENDORSED  
FILED  
San Francisco County Superior Court

NOV 4 8 2011

CLERK OF THE COURT  
BY: DEBORAH STEPPE  
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN FRANCISCO

ENVIRONMENTAL RESEARCH  
CENTER, a California non-profit  
corporation,

Plaintiff,

v.

ORGANIC BY NATURE, INC.;  
PLATINUM HEALTH PRODUCTS;  
PURIUM HEALTH PRODUCTS; PURE  
PLANET PRODUCTS, INC.; PURE  
PLANET PRODUCTS; PURE PLANET  
OASIS, LLC.; and DOES 1-50, inclusive,

Defendants.

Case No.

CGC-11-516015

COMPLAINT FOR INJUNCTIVE  
RELIEF AND CIVIL PENALTIES

[Health & Safety Code §25249.5, *et seq.*]

Plaintiff Environmental Research Center brings this action in the interests of the general public and, on information and belief, hereby alleges:

**INTRODUCTION**

1. This action seeks to remedy Defendants' continuing failure to warn consumers in California that they are being exposed to lead, a substance known to the State of California<sup>1</sup> to cause cancer, birth defects and other reproductive harm.

2. Defendants have manufactured, packaged, distributed, marketed, sold and/or have otherwise been involved in the chain of commerce of, and continue to manufacture, package, distribute, market, sell, and/or otherwise continue to be involved in the chain of commerce of the

<sup>1</sup> All statutory and regulatory references herein are to California law, unless otherwise specified.

1 following ingestible products, which contain the chemical lead and which have been and  
2 continue to be offered for sale, sold and/or otherwise provided for use and/or handling to  
3 individuals in California.

- 4 - Organic By Nature Pure Planet Products Ginseng PLUS tablets
- 5 - Organic By Nature Pure Planet Products Green Kamut Wheatgrass Juice Pure  
Juice Powder
- 6 - Organic By Nature Pure Planet Products Bio Fruit
- 7 - Organic By Nature Pure Planet Products Organic Best of Greens
- 8 - Organic By Nature Pro Fiber E.F.A.
- 9 - Platinum Health Products Joint-Flex
- 10 - Platinum Health Products Herbal Fiber Cleanse
- 11 - Platinum Health Products Heart-Aid
- 12 - Platinum Health Products Immuno-Max
- 13 - Platinum Health Products Renew Hair, Skin & Nails
- 14 - Platinum Health Products Nutrition Now Meal Option Creamy Vanilla
- 15 - Platinum Health Products Daily Fiber Blend
- 16 - Purium Health Products Control
- 17 - Purium Health Products Scoop of Greens Juicy Green Apple Flavor
- 18 - Purium Health Products Organic Best of Greens
- 19 - Purium Health Products More Greens
- 20 - Pure Planet Products Inc. Red Marine Algae Plus
- 21 - Pure Planet Products Inc. Ginseng Plus powder
- 22 - Pure Planet Products Inc. Ginseng Plus tablets
- 23 - Pure Planet Products Inc. Chlorella Nature's SuperGreen Food
- 24 - Pure Planet Products Inc. 100% Hawaiian Spirulina
- 25 - Pure Planet Products Inc. Power Carob Mint Spirulina with Ester-C 100 Tablets
- 26 - Pure Planet Products Inc. Ginseng Chew Cinnamon
- 27 - Pure Planet Products Inc. Carob Mint Spirulina with Ester-C 30 Tablets

19 These listed products are hereinafter referred to as "THE PRODUCTS".

20 3. The use and/or handling of each of THE PRODUCTS causes exposures to lead at  
21 levels requiring a "clear and reasonable warning" under California's Safe Drinking Water and  
22 Toxic Enforcement Act of 1986, Health & Safety Code ("H&S Code") §25249.5, *et. seq.* (also  
23 known as "Proposition 65"). Defendants have failed to provide the health hazard warnings  
24 required by Proposition 65.

25 4. The continued manufacturing, packaging, distributing, marketing and/or sales of  
26 THE PRODUCTS without the required health hazard warnings, causes individuals to be  
27 involuntarily and unwittingly exposed to levels of lead that violate Proposition 65.

28 5. Plaintiff seeks injunctive relief enjoining Defendants from the continued

1 manufacturing, packaging, distributing, marketing and/or selling of THE PRODUCTS for sale or  
2 use in California without first providing clear and reasonable warnings, within the meaning of  
3 Proposition 65, regarding the risks of cancer, birth defects and other reproductive harm posed by  
4 exposure to lead through the use and/or handling of THE PRODUCTS. Plaintiff seeks an  
5 injunctive order compelling Defendants to bring their business practices into compliance with  
6 Proposition 65 by providing clear and reasonable warnings to each individual who may be  
7 exposed to lead from the use and/or handling of THE PRODUCTS.

8 6. In addition to injunctive relief, Plaintiff seeks an assessment of civil penalties to  
9 remedy Defendants' failure to provide clear and reasonable warnings regarding exposures to the  
10 lead.

### 11 **JURISDICTION AND VENUE**

12 7. This Court has jurisdiction over this action pursuant to California Constitution  
13 Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes except  
14 those given by statute to other trial courts." The statute under which this action is brought does  
15 not specify any other basis for jurisdiction.

16 8. This Court has jurisdiction over Defendants because, based on information and  
17 belief, Defendants are businesses having sufficient minimum contacts with California, or  
18 otherwise intentionally availing themselves of the California market through the marketing,  
19 distribution and/or sale of THE PRODUCTS in the State of California to render the exercise of  
20 jurisdiction over them by the California courts consistent with traditional notions of fair play and  
21 substantial justice.

22 9. This Court is the proper venue for this action because the Defendants have  
23 violated California law in the County of San Francisco. Furthermore, this Court is the proper  
24 venue under Code of Civil Procedure §395.5 and H&S Code §25249.7(a), which provides that  
25 any person who violates or threatens to violate H&S Code §§25249.5 or 25249.6 may be  
26 enjoined in any court of competent jurisdiction.

### 27 **PARTIES**

28 10. Plaintiff Environmental Research Center ("ERC") is a non-profit corporation  
organized under California's Non-Profit Benefit Corporation Law. ERC is dedicated to, among

1 other causes, reducing the use and misuse of hazardous and toxic substances, consumer  
2 protection, worker safety and corporate responsibility.

3 11. ERC is a person within the meaning of H&S Code §25118 and brings this  
4 enforcement action in the public interest pursuant to H&S Code §25249.7(d).

5 12. Defendant ORGANIC BY NATURE, INC. is a corporation and a person within  
6 the meaning of H&S Code §25249.11(a). Defendant ORGANIC BY NATURE, INC. has  
7 manufactured, packaged, distributed, marketed, sold and/or has otherwise been involved in the  
8 chain of commerce of, and continues to manufacture, package, distribute, market, sell, and/or  
9 otherwise continues to be involved in the chain of commerce of THE PRODUCTS for sale or use  
10 in California.

11 13. Defendant PLATINUM HEALTH PRODUCTS is a company of unknown form  
12 and a person within the meaning of H&S Code §25249.11(a). Defendant PLATINUM  
13 HEALTH PRODUCTS has manufactured, packaged, distributed, marketed, sold and/or has  
14 otherwise been involved in the chain of commerce of, and continues to manufacture, package,  
15 distribute, market, sell, and/or otherwise continues to be involved in the chain of commerce of  
16 THE PRODUCTS for sale or use in California.

17 14. Defendant PURIUM HEALTH PRODUCTS is a company of unknown form and  
18 a person within the meaning of H&S Code §25249.11(a). Defendant PURIUM HEALTH  
19 PRODUCTS has manufactured, packaged, distributed, marketed, sold and/or has otherwise been  
20 involved in the chain of commerce of, and continues to manufacture, package, distribute, market,  
21 sell, and/or otherwise continues to be involved in the chain of commerce of THE PRODUCTS  
22 for sale or use in California.

23 15. Defendant PURE PLANET PRODUCTS, INC. is a corporation and a person  
24 within the meaning of H&S Code §25249.11(a). Defendant PURE PLANET PRODUCTS,  
25 INC. has manufactured, packaged, distributed, marketed, sold and/or has otherwise been  
26 involved in the chain of commerce of, and continues to manufacture, package, distribute, market,  
27 sell, and/or otherwise continues to be involved in the chain of commerce of THE PRODUCTS  
28 for sale or use in California.

16. Defendant PURE PLANET PRODUCTS is a company of unknown form and a  
person within the meaning of H&S Code §25249.11(a). Defendant PURE PLANET

1 PRODUCTS has manufactured, packaged, distributed, marketed, sold and/or has otherwise been  
2 involved in the chain of commerce of, and continues to manufacture, package, distribute, market,  
3 sell, and/or otherwise continues to be involved in the chain of commerce of THE PRODUCTS  
4 for sale or use in California.

5 17. Defendant PURE PLANET OASIS, LLC. is a limited liability company of and a  
6 person within the meaning of H&S Code §25249.11(a). Defendant PURE PLANET OASIS,  
7 LLC. has manufactured, packaged, distributed, marketed, sold and/or has otherwise been  
8 involved in the chain of commerce of, and continues to manufacture, package, distribute, market,  
9 sell, and/or otherwise continues to be involved in the chain of commerce of THE PRODUCTS  
10 for sale or use in California.

11 18. Defendants Does 1-50 are named herein under fictitious names, as their true  
12 names and capacities are unknown to Plaintiff. ERC is informed and believes, and thereon  
13 alleges, that each of said Does has manufactured, packaged, distributed, marketed, sold and/or  
14 has otherwise been involved in the chain of commerce of, and continues to manufacture,  
15 package, distribute, market, sell, and/or otherwise continues to be involved in the chain of  
16 commerce of THE PRODUCTS for sale or use in California, and/or is responsible, in some  
17 actionable manner, for the events and happenings referred to herein, either through its conduct or  
18 through the conduct of its agents, servants or employees, or in some other manner, causing the  
19 harms alleged herein. Plaintiff will seek leave to amend this Complaint to set forth the true  
20 names and capacities of Does when ascertained.

### 21 STATUTORY BACKGROUND

22 19. The People of the State of California have declared in Proposition 65 their right  
23 “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other  
24 reproductive harm.” (Section 1(b) of Initiative Measure, Proposition 65).

25 20. To effect this goal, Proposition 65 requires that individuals be provided with a  
26 “clear and reasonable warning” before being exposed to substances listed by the State of  
27 California as causing cancer or reproductive toxicity. H&S Code §25249.6 states, in pertinent  
28 part:

No person in the course of doing business shall knowingly and intentionally  
expose any individual to a chemical known to the state to cause cancer or

1 reproductive toxicity without first giving clear and reasonable warning to  
2 such individual....

3 21. Proposition 65 provides that any person who "violates or threatens to violate" the  
4 statute "may be enjoined in any court of competent jurisdiction." (H&S Code §25249.7(a).)  
5 "Threaten to violate" is defined to mean creating "a condition in which there is a substantial  
6 probability that a violation will occur." (H&S Code §25249.11(e).) Violators are liable for civil  
7 penalties of up to \$2,500 per day for each violation of Proposition 65. (H&S Code §25249.7(b).)

### 8 **FACTUAL BACKGROUND**

9 22. On February 27, 1987, the State of California officially listed the chemical lead as  
10 a chemical known to cause developmental and reproductive toxicity. Lead became subject to the  
11 warning requirement one year later and was therefore subject to the "clear and reasonable"  
12 warning requirements of Proposition 65 beginning on February 27, 1988. (27 California Code of  
13 Regulations ("CCR") §25000, *et seq.*; H&S Code §25249.5, *et seq.*)

14 23. On October 1, 1992, the State of California officially listed the chemical lead as a  
15 chemical known to cause cancer. Lead became subject to the warning requirement one year later  
16 and was therefore subject to the "clear and reasonable" warning requirements of Proposition 65  
17 beginning on October 1, 1993. (27 CCR §25000, *et seq.*; H&S Code §25249.5, *et seq.*)

18 24. Plaintiff is informed and believes, and based on such information and belief,  
19 alleges THE PRODUCTS have been marketed, distributed and/or sold to individuals in  
20 California without the requisite clear and reasonable warnings before, on, and after December  
21 23, 2010. THE PRODUCTS continue to be marketed, distributed and sold in California without  
22 the requisite warning information.

23 25. As a proximate result of acts by Defendants, as persons in the course of doing  
24 business within the meaning of H&S Code §25249.11(b), individuals throughout the State of  
25 California, including in the County of San Francisco, have been exposed to lead without clear  
26 and reasonable warnings. The individuals subject to exposures to lead include normal and  
27 foreseeable users of THE PRODUCTS, as well as all other persons exposed to THE  
28 PRODUCTS.

29 26. At all times relevant to this action, Defendants have knowingly and intentionally  
30 exposed the users and/or handlers of THE PRODUCTS to lead without first giving clear and

1 reasonable warnings to such individuals.

2 27. Individuals using or handling THE PRODUCTS are exposed to lead in excess of  
3 the "maximum allowable daily" and "no significant risk" levels determined by the State of  
4 California, as applicable.

5 28. At all times relevant to this action, Defendants have, in the course of doing  
6 business, failed to provide individuals using and/or handling THE PRODUCTS with clear and  
7 reasonable warnings that THE PRODUCTS exposes individuals to lead.

8 29. THE PRODUCTS continue to be marketed, distributed, and/or sold in California  
9 without the requisite clear and reasonable warnings.

### 10 **FIRST CAUSE OF ACTION**

11 **(Injunctive Relief for Violations of Health and Safety Code §25249.5, *et seq.* concerning**  
12 **THE PRODUCTS, which are identified in Plaintiff's December 23, 2010 60-Day Notice of**  
13 **Violations)**

14 30. Plaintiff realleges and incorporates by reference Paragraphs 1 through 29,  
15 inclusive, as if specifically set forth herein.

16 31. On December 23, 2010, Plaintiff sent a 60-Day Notice of Proposition 65  
17 violations to the requisite public enforcement agencies and to Defendants ORGANIC BY  
18 NATURE, INC., PLATINUM HEALTH PRODUCTS, PURIUM HEALTH PRODUCTS,  
19 PURE PLANET PRODUCTS, INC., PURE PLANET PRODUCTS, and PURE PLANET  
20 OASIS, LLC. ("Notice of Violations"). THE PRODUCTS were identified in the Notice of  
21 Violations as containing lead exceeding allowable levels. The Notice of Violations was issued  
22 pursuant to, and in compliance with, the requirements of H&S Code §25249.7(d) and the  
23 statute's implementing regulations regarding the notice of violations to be given to certain public  
24 enforcement agencies and to the violator. The Notice of Violations was issued as follows:

- 25 a. Defendants ORGANIC BY NATURE, INC., PLATINUM HEALTH  
26 PRODUCTS, PURIUM HEALTH PRODUCTS, PURE PLANET  
27 PRODUCTS, INC., PURE PLANET PRODUCTS and PURE PLANET  
28 OASIS, LLC., and the California Attorney General were provided copies  
by Certified Mail of the Notice of Violations, along with a Certificate of  
Merit by the attorney for the noticing party stating that there is a  
reasonable and meritorious cause for this action. The requisite county

1 district attorneys and city attorneys were provided copies by First Class  
2 Mail of the Notice of Violations and Certificate of Merit.

3 b. Defendants ORGANIC BY NATURE, INC., PLATINUM HEALTH  
4 PRODUCTS, PURIUM HEALTH PRODUCTS, PURE PLANET  
5 PRODUCTS, INC., PURE PLANET PRODUCTS and PURE PLANET  
6 OASIS, LLC. were provided, with the Notice of Violations, a copy of a  
7 document entitled "The Safe Drinking Water and Toxic Enforcement Act  
8 of 1986 (Proposition 65): A Summary," which is also known as Appendix  
9 A to Title 27 of CCR §25903.

10 c. The California Attorney General was provided, with the Notice of  
11 Violations, additional factual information sufficient to establish a  
12 basis for the certificate, including the identity of the persons consulted  
13 with and relied on by the certifier, and the facts, studies, or other data  
14 reviewed by those persons, pursuant to H&S Code §§25249.7(d)(1) and  
25249.7(h)(2).

15 32. The appropriate public enforcement agencies have failed to commence and  
16 diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against Defendants  
17 based on the allegations herein.

18 33. By committing the acts alleged in this Complaint, Defendants at all times relevant  
19 to this action, and continuing through the present, have violated and continue to violate H&S  
20 Code §25249.6 by, in the course of doing business, knowingly and intentionally exposing  
21 individuals who use or handle THE PRODUCTS to the chemical lead at levels exceeding  
22 allowable exposure levels without Defendants first giving clear and reasonable warnings to such  
23 individuals pursuant to H&S Code §§25249.6 and 25249.11(f). Defendants have manufactured,  
24 packaged, distributed, marketed, sold and/or have otherwise been involved in the chain of  
25 commerce of, and continue to manufacture, package, distribute, market, sell, and/or otherwise  
26 continue to be involved in the chain of commerce of THE PRODUCTS, which have been, are,  
27 and will be used and/or handled by individuals in California, without Defendants providing clear  
28 and reasonable warnings, within the meaning of Proposition 65, regarding the risks of cancer,  
birth defects and other reproductive harm posed by exposure to lead through the use and/or  
handling of THE PRODUCTS. Furthermore, Defendants have threatened to violate H&S Code



1 §25249.6 by THE PRODUCTS being marketed, offered for sale, sold and/or otherwise provided  
2 for use and/or handling to individuals in California.

3 34. By the above-described acts, Defendants have violated H&S Code §25249.6 and  
4 are therefore subject to an injunction ordering Defendants to stop violating Proposition 65, and to  
5 provide required warnings to consumers and other individuals who will purchase, use and/or  
6 handle THE PRODUCTS.

7 35. An action for injunctive relief under Proposition 65 is specifically authorized by  
8 Health & Safety Code §25249.7(a).

9 36. Continuing commission by Defendants of the acts alleged above will irreparably  
10 harm the citizens of the State of California, for which harm they have no plain, speedy, or  
adequate remedy at law.

11 Wherefore, plaintiff prays judgment against Defendants, as set forth hereafter.

12 **SECOND CAUSE OF ACTION**

13 **(Civil Penalties for Violations of Health and Safety Code §25249.5, *et seq.* concerning THE**  
14 **PRODUCTS, which are identified in Plaintiff's December 23, 2010 60-Day Notice of**  
**Violations)**

15 37. Plaintiff realleges and incorporates by reference Paragraphs 1 through 36,  
16 inclusive, as if specifically set forth herein.

17 38. On December 23, 2010, Plaintiff sent a 60-Day Notice of Proposition 65  
18 violations to the requisite public enforcement agencies and to Defendants ORGANIC BY  
19 NATURE, INC., PLATINUM HEALTH PRODUCTS, PURIUM HEALTH PRODUCTS,  
20 PURE PLANET PRODUCTS, INC., PURE PLANET PRODUCTS, and PURE PLANET  
21 OASIS, LLC. ("Notice of Violations"). THE PRODUCTS were identified in the Notice of  
22 Violations as containing lead exceeding allowable levels. The Notice of Violations was issued  
23 pursuant to, and in compliance with, the requirements of H&S Code §25249.7(d) and the  
24 statute's implementing regulations regarding the notice of violations to be given to certain public  
enforcement agencies and to the violator. The Notice of Violations was issued as follows:

- 25 a. Defendants ORGANIC BY NATURE, INC., PLATINUM HEALTH  
26 PRODUCTS, PURIUM HEALTH PRODUCTS, PURE PLANET  
27 PRODUCTS, INC., PURE PLANET PRODUCTS and PURE PLANET  
28 OASIS, LLC., and the California Attorney General were provided copies

1 by Certified Mail of the Notice of Violations, along with a Certificate of  
2 Merit by the attorney for the noticing party stating that there is a  
3 reasonable and meritorious cause for this action. The requisite county  
4 district attorneys and city attorneys were provided copies by First Class  
5 Mail of the Notice of Violations and Certificate of Merit.

6 b. Defendants ORGANIC BY NATURE, INC., PLATINUM HEALTH  
7 PRODUCTS, PURIUM HEALTH PRODUCTS, PURE PLANET  
8 PRODUCTS, INC., PURE PLANET PRODUCTS and PURE PLANET  
9 OASIS, LLC. were provided, with the Notice of Violations, a copy of a  
10 document entitled "The Safe Drinking Water and Toxic Enforcement Act  
11 of 1986 (Proposition 65): A Summary," which is also known as Appendix  
12 A to Title 27 of CCR §25903.

13 c. The California Attorney General was provided, with the Notice of  
14 Violations, additional factual information sufficient to establish a  
15 basis for the certificate, including the identity of the persons consulted  
16 with and relied on by the certifier, and the facts, studies, or other data  
17 reviewed by those persons, pursuant to H&S Code §§25249.7(d)(1) and  
18 25249.7(h)(2).

19 39. The appropriate public enforcement agencies have failed to commence and  
20 diligently prosecute a cause of action under H&S Code §2524935, *et seq.* against Defendants  
21 based on the allegations herein.

22 40. By committing the acts alleged in this Complaint, Defendants at all times relevant  
23 to this action, and continuing through the present, have violated and continue to violate H&S  
24 Code §25249.6 by, in the course of doing business, knowingly and intentionally exposing  
25 individuals who use or handle THE PRODUCTS to the chemical lead at levels exceeding  
26 allowable exposure levels without Defendants first giving clear and reasonable warnings to such  
27 individuals pursuant to H&S Code §§25249.6 and 25249.11(f). Defendants have manufactured,  
28 packaged, distributed, marketed, sold and/or have otherwise been involved in the chain of  
commerce of, and continue to manufacture, package, distribute, market, sell, and/or otherwise  
continue to be involved in the chain of commerce of THE PRODUCTS, which have been, are,  
and will be used and/or handled by individuals in California, without Defendants providing clear

1 and reasonable warnings, within the meaning of Proposition 65, regarding the risks of cancer,  
2 birth defects and other reproductive harm posed by exposure to lead through the use and/or  
3 handling of THE PRODUCTS. Furthermore, Defendants have threatened to violate H&S Code  
4 §25249.6 by THE PRODUCTS being marketed, offered for sale, sold and/or otherwise provided  
5 for use and/or handling to individuals in California.

6 41. By the above-described acts, Defendants are liable, pursuant to H&S Code  
7 §25249.7(b), for a civil penalty of \$2,500 per day for each violation of H&S Code §25249.6  
8 relating to THE PRODUCTS.

9 Wherefore, plaintiff prays judgment against Defendants, as set forth hereafter.

### 10 **THE NEED FOR INJUNCTIVE RELIEF**

11 42. Plaintiff realleges and incorporates by this reference Paragraphs 1 through 41, as  
12 if set forth below.

13 43. By committing the acts alleged in this Complaint, Defendants have caused  
14 irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence  
15 of equitable relief, Defendants will continue to create a substantial risk of irreparable injury by  
16 continuing to cause consumers to be involuntarily and unwittingly exposed to lead through the  
17 use and/or handling of THE PRODUCTS.

### 18 **PRAYER FOR RELIEF**

19 Wherefore, Plaintiff prays for the following relief:

20 A. A preliminary and permanent injunction enjoining Defendants, their agents,  
21 employees, assigns and all persons acting in concert or participating with Defendants, from  
22 manufacturing, packaging, distributing, marketing and/or selling THE PRODUCTS for sale or  
23 use in California without first providing clear and reasonable warnings, within the meaning of  
24 Proposition 65, that the users and/or handlers of THE PRODUCTS are exposed to the lead.

25 B. An assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),  
26 against Defendants in the amount of \$2,500 per day for each violation of Proposition 65;

27 C. An award to Plaintiff of its reasonable attorney fees pursuant to California Code  
28 of Civil Procedure §1021.5 or the substantial benefit theory;


D. An award of costs of suit herein; and

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E. Such other and further relief as may be just and proper.

Dated: November 18, 2011

LAW OFFICE OF PHILIP T. EMMONS

By:   
Philip T. Emmons  
Attorney for Plaintiff  
Environmental Research Center